



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

9903-172-2

601 Pole Line Road, Suite 2 • Twin Falls, Idaho 83301-3035 • (208) 736-2190  
September 22, 2000

Dirk Kempthorne, Governor  
C. Stephen Allred, Director

CERTIFIED MAIL #7000 0520 0014 5096 8092

RECEIVED

SEP 26 2000

Mr. Gary Bremer  
NW Design Molders, Incorporated  
208 Rose Street  
Jerome, Idaho 83338

DEPARTMENT OF ENVIRONMENTAL QUALITY  
STATE A Q PROGRAM

RE: T2-9903-172, NW Design Molders, Inc., Jerome  
Final Tier II Operating Permit No. #053-00005, Expanded Plastic Foam Products

Dear Mr. Bremer:

On March 16, 1999, the Idaho Department of Environmental Quality (DEQ) received an application for a Tier II Operating Permit (OP) from Foam Molders, Incorporated. On November 24, 1999, the application was declared complete.

On July 20, 2000, a proposed Tier II OP was issued for public comment. The public comment period was from July 20, 2000 through August 21, 2000. DEQ did not receive any comments about the content of the proposed OP.

Based on review of your application, state and federal rules and regulations, and comments received, DEQ finds this project meets the provisions of IDAPA 58.01.01.400 (*Rules for the Control of Air Pollution in Idaho*). Therefore, enclosed is the final Tier II OP #055-00047 for the emissions that exist at your facility.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, Idaho 83706-1255, within thirty-five (35) days of the date of this decision. However, DEQ encourages you to contact the Air Quality Permit Program to address any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Bill Allred, of the Twin Falls Regional Office, at (208) 736-2190.

Sincerely,

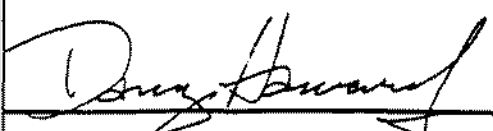
Doug Howard  
Regional Administrator  
Twin Falls Regional Office

RA/REB/bm

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Enclosure

cc: DEQ State Office *DS*  
Twin Falls Regional Office  
L. Kral, EPA - Region 10

<b>STATE OF IDAHO</b>  <b>AIR POLLUTION</b> <b>OPERATING PERMIT</b>  <b>GENERAL INFORMATION</b>	<div style="text-align: center;"> <b>PERMIT NUMBER</b>  <div style="display: flex; justify-content: center; gap: 10px;"> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">5</div> <div style="border: 1px solid black; padding: 2px 5px;">3</div> <div style="border: 1px solid black; padding: 2px 5px;">-</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">5</div> </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;"> <b>AQCR</b>  <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">6</div> <div style="border: 1px solid black; padding: 2px 5px;">3</div> </div> <div style="text-align: center;"> <b>CLASS</b>  <div style="border: 1px solid black; padding: 2px 5px;">A</div> <div style="border: 1px solid black; padding: 2px 5px;">2</div> </div> <div style="text-align: center;"> <b>SIC</b>  <div style="border: 1px solid black; padding: 2px 5px;">3</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">8</div> <div style="border: 1px solid black; padding: 2px 5px;">6</div> </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;"> <b>ZONE</b>  <div style="border: 1px solid black; padding: 2px 5px;">1</div> <div style="border: 1px solid black; padding: 2px 5px;">1</div> </div> <div style="text-align: center;"> <b>UTM COORDINATE (km)</b>  <div style="border: 1px solid black; padding: 2px 5px;">7</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">3</div> <div style="border: 1px solid black; padding: 2px 5px;">.</div> <div style="border: 1px solid black; padding: 2px 5px;">6</div> <div style="border: 1px solid black; padding: 2px 5px;">.</div> <div style="border: 1px solid black; padding: 2px 5px;">4</div> <div style="border: 1px solid black; padding: 2px 5px;">7</div> <div style="border: 1px solid black; padding: 2px 5px;">3</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">.</div> <div style="border: 1px solid black; padding: 2px 5px;">9</div> </div> </div>				
1.	<b>PERMITTEE</b> NW Design Molders, Inc.				
2.	<b>PROJECT</b> Tier II Operating Permit				
3.	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 40%;"><b>MAILING ADDRESS</b> 280 Rose Street</td> <td style="width: 30%;"><b>TELEPHONE #</b> (208) 777-8485</td> <td style="width: 30%;"><b>COUNTY</b> Jerome</td> </tr> </table>	<b>MAILING ADDRESS</b> 280 Rose Street	<b>TELEPHONE #</b> (208) 777-8485	<b>COUNTY</b> Jerome	
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6.	<b>EXACT PLANT LOCATION</b> 280 Rose Street, Jerome, Idaho				
7.	<b>GENERAL NATURE OF BUSINESS &amp; KINDS OF PRODUCTS</b> Expanded Plastic Foam Products				
8.	<b>PERMIT AUTHORITY</b>  <p>This Permit is issued according to the <b>Rules for the Control of Air Pollution in Idaho</b>, Section 58.01.01.400 and pertains only to emissions of air contaminants which are regulated by the State of Idaho and to the sources specifically allowed to be operated by this Permit.</p> <p>THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF DESIGN INFORMATION PRESENTED IN THE APPLICATION AND DEQ'S TECHNICAL ANALYSIS OF THE SUPPLIED INFORMATION. CHANGES IN DESIGN OR EQUIPMENT, THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS, MAY BE A MODIFICATION. MODIFICATIONS ARE SUBJECT TO DEPARTMENT REVIEW IN ACCORDANCE WITH SECTION 58.01.01.200 OF THE RULES FOR THE CONTROL OF AIR POLLUTION IN IDAHO.</p>				
					
ADMINISTRATOR, TWIN FALLS REGIONAL OFFICE  DEPARTMENT OF ENVIRONMENTAL QUALITY	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;"><b>ISSUED DATE</b></td> <td>September 22, 2000</td> </tr> <tr> <td><b>EXPIRATION DATE</b></td> <td>September 22, 2005</td> </tr> </table>	<b>ISSUED DATE</b>	September 22, 2000	<b>EXPIRATION DATE</b>	September 22, 2005
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**AIR POLLUTION OPERATING PERMIT  
PERMITTEE, PROJECT, AND LOCATION**

**PERMIT NUMBER**

053 - 00005

NW Design Molders, Inc.  
Tier II Operating Permit  
Jerome, Idaho

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

**SOURCE**

**FACILITY WIDE CONDITIONS**

**A. FACILITY-WIDE CONDITIONS**

- A.1 All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651 (*Rules for the Control of Air Pollution in Idaho*).
- A.2 The Permittee shall monitor and record in a log the periodic method(s) used to reasonably control fugitive emissions. The log shall include the type of control used (i.e. water, environmentally safe chemical dust suppressants, etc.).
- A.3 The Permittee shall maintain a log of all fugitive dust complaints received. The log shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the Permittee's assessment of the validity of the complaint, and any corrective action taken. If the complaint has merit, the Permittee shall take all necessary corrective action.
- A.4 No person shall allow, suffer, cause or permit the emission of odorous gases, liquids or solids into the atmosphere in such quantities as to cause air pollution.
- A.5 The Permittee shall maintain a log of odor complaints received. The log shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the Permittee's assessment of the validity of the complaint, and any corrective action taken.
- A.6 The Permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.
- A.7 The facility shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for the Control of Open Burning*.
- A.8 Excess emissions reports and notifications required by IDAPA 58.01.01.130-136 shall be made to:

Air Quality Permit Compliance  
Department of Environmental Quality  
Twin Falls Regional Office  
601 Pole Line Road, Suite 2  
Twin Falls, ID 83301

**ISSUED: September 22, 2000**  
**EXPIRES: September 22, 2005**

AIR POLLUTION OPERATING PERMIT  
PERMITTEE, PROJECT, AND LOCATION

## PERMIT NUMBER

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NW Design Molders, Inc.  
Tier II Operating Permit  
Jerome, Idaho

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

## SOURCE

BOILER

## B. Boiler

## B.1. EMISSION LIMITS

B.1.1 Natural Gas Combustion

The particulate matter (PM) emission shall not exceed 0.015 grains per dry standard cubic foot of effluent gas adjusted to three percent (3%) oxygen by volume when natural gas is combusted, as required in IDAPA 58.01.01.676 and 677.

B.1.2 Visible Emissions

Visible emissions from the boiler exhaust stack shall not exceed twenty percent (20%) opacity over a period or periods aggregated more than three (3) minutes in any sixty (60) minute period, in accordance with IDAPA 58.01.01.625.

## B.2. OPERATING REQUIREMENTS

B.2.1 Fuel Specification

The Superior boiler shall combust natural gas exclusively.

ISSUED: September 22, 2000  
EXPIRES: September 22, 2005

**AIR POLLUTION OPERATING PERMIT  
PERMITTEE, PROJECT, AND LOCATION**

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NW Design Molders, Inc.  
Tier II Operating Permit  
Jerome, Idaho

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

**SOURCE**

PRE-EXPANDERS, PREPUFF STORAGE, MOLDING, PRESSES,

1ST 24 HOURS, AND 2ND 24 HOURS, AFTER MOLDING

**C. PRE-EXPANDERS**

**C.1. EMISSION LIMITS**

**C.1.1 Volatile Organic Compound Emission Limits**

The combined Volatile Organic Compounds (VOC) emissions from the Kurtz pre-expander and the NWB pre-expander, the 24-hr of Pre-puff storage, molding, presses, 1st 24 hours after molding, and 2nd 24 hours after molding, shall not exceed the pounds per hour (lb/hr) or the tons per any consecutive twelve month period (T/yr) listed in Appendix A.

**C.1.2 Visible Emissions**

Visible emissions from each of the following processes: pre-expanders, pre-puff storage, molding, presses, and the warehouse shall not exceed twenty percent (20%) opacity over a period or periods aggregated more than three (3) minutes in any sixty (60) minute period, in accordance with IDAPA 58.01.01.625.

**C.2. OPERATING REQUIREMENTS**

**C.2.1 EPS Bead Throughput**

- C.2.1.1. The Permittee shall not exceed the throughput rate of four hundred fifty-five (455) pounds per hour as the combine Expandible Polystyrene (EPS) bead rate of the Kurtz and the NWB expanders.
- C.2.1.2. The Permittee shall not exceed a throughput of four hundred fifty-five thousand (455,000) pounds of EPS beads for any consecutive 12 month period.
- C.2.1.3. The Permittee shall not expand EPS beads that contain pentane greater than 7% by weight.

**ISSUED: September 22, 2000  
EXPIRES: September 22, 2005**

**AIR POLLUTION OPERATING PERMIT  
PERMITTEE, PROJECT, AND LOCATION**

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NW Design Molders, Inc.  
Tier II Operating Permit  
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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

**SOURCE**

PRE-EXPANDERS, PREPUFF STORAGE, MOLDING, PRESSES,

1ST 24 HOURS, AND 2ND 24 HOURS, AFTER MOLDING

**C.3. MONITORING AND RECORDKEEPING REQUIREMENTS**

**C.3.2 Operation Parameters Monitors**

The Permittee shall record the following in a log to verify compliance with Section C.2.1 of this permit. The log shall be kept at the facility for the most recent two (2) year period and shall be made available to DEQ representatives upon request.

C.3.2.1 Calendar date, pounds of EPS beads expanded each month (lb/mo) and combined hours that the expanders operated each month (hr/mo). Divide the #/mo by the hr/mo to calculate the hourly rate.

C.3.2.2 Documentation for each purchase of EPS beads which will indicate the beads contain 7% or less pentane by weight.

C.3.2.3 Calendar date and the total pounds of EPS beads expanded for the previous consecutive 12 month period.

**ISSUED: September 22, 2000  
EXPIRES: September 22, 2005**

APPENDIX A

NW DESIGN MOLDERS - JEROME

EMISSION LIMITS<sup>a</sup> -- DAILY (lb/day) AND ANNUAL (T/yr)

EMISSION UNIT DESCRIPTION	VOCs	
	lb/hr	T/yr
Combined emissions from Pre-Expanders, PrePuff Storage, molding, presses, 1st 24 hours and 2nd 24 hours after molding.	38	13.6

- a As determined by a pollutant specific promulgated U.S. EPA method, or Department approved alternative, or as determined by Department's emission estimation methods used in this permit analysis.

ISSUED: September 22, 2000  
EXPIRES: September 22, 2005

**TIER II OPERATING PERMIT GENERAL PROVISIONS**

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code 39-101 et. seq.
- B. The Permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The Permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the Permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
  - 2) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emission testing (i.e., performance tests) in conformance with state approved or accepted EPA procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 39-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environmental Quality.
- E. Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the Permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the Permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the Permittee to develop a list of Operation and Maintenance Procedures which must be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the Permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I. Performance tests (i.e.: air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with the Department's Procedures Manual for Air Pollution Control. Such testing shall not be conducted on weekends or state holidays unless the Permittee obtains prior Department approval.
- The Permittee shall submit a test protocol and a proposed test date for each performance test required by this permit to the Department for approval at least thirty (30) days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The Permittee shall promptly notify the Department of any change in the proposed test date and shall provide at least five (5) working days advanced notice prior to conducting any rescheduled test, unless the Department approves a shorter notice period.
- Within forty-five (45) days of the date on which a performance test required by this permit is concluded, the Permittee shall submit to the Department a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.
- The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit which demonstrated compliance with the respective pollutant emission limit unless: (1) a more restrictive operating limit is specified elsewhere in this permit or; (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.
- J. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

**ISSUED: September 22, 2000**  
**EXPIRES: September 22, 2005**